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July 7, 2006

## Via Courier

Mr. Mazin Enwiya Remedial Project Manager U.S. Environmental Protection Agency Region 5 77 West Jackson Boulevard Chicago, Illinois 60604-3590

Re:

Ellsworth Industrial Park Site

Downers Grove, Illinois

EPA Region 5 Records Ctr.

Dear Mr. Enwiya:

Enclosed on behalf of Ames Supply Company and White Lake Building Corporation are copies of documents responsive to the U.S. Environmental Protection Agency's June 12, 2006 letter directed to Bruce White as Project Coordinator for the above-referenced matter. In particular, I have enclosed the following:

- Robert C. Hildebrandt's November 16, 2005 Deposition Transcript and Exhibits in Muniz v. Rexnord et al.;
- Raymond J. Kuthan's April 17, 2006 Deposition Transcript and Exhibits in Muniz v. Rexnord et al.;
- Carey Turner's October 12, 2005 Deposition Transcript and Exhibits in Muniz v. Rexnord et al. (not included are pages 24 through 34, 70, 73, 92 and exhibits 33, 34, 35, 36, 37, 38, 39, 40, and 41, which have been designated as confidential for purposes of the case);
- Ray McSweaney's October 11, 2005 Deposition Transcript and Exhibits in Muniz v.
   Rexnord et al. (not included are pages 12, 102 through 104, 113, 114 and exhibit 28, which have been designated as confidential for purposes of the case);
- Dan Cervenka's October 12, 2005 Deposition Transcript and Exhibits in Muniz v.
   Rexnord et al. (not included are pages 9, 13 through 17, 57, 58 and exhibit 43, which have been designated as confidential for purposes of the case);
- Building Schematics produced by Ames Supply Company in Muniz v. Rexnord et al. (AMES/MUN 21806 to AMES/MUN 21854);



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- Schematic produced by Downers Grove Sanitary District in Muniz v. Rexnord et al. (bates-labeled DGSD 003969-003974);
- Notes from April 10, 2006 Investigation of former Ames Supply Company property, produced in Muniz v. Rexnord et al. (bates-labeled AMES/MUN 457762-457766);
- Ames Supply Company's Responses to Plaintiffs' First Set of Interrogatories in Muniz v. Rexnord et al.;
- White Lake Building Corporation's Responses to Third-Party Plaintiffs' First Set of Interrogatories in Muniz v. Rexnord et al.;
- Ames Supply Company's Objections and Answers to Plaintiff's First Set of Interrogatories in Pote v. Ames Supply Co. et al.;
- Ames Supply Company's Answers and Objections to Scot, Incorporated's First Set of Interrogatories to Defendants and Third-Party Defendants in Pote v. Ames Supply Co. et al.;
- Ames Supply Company's Answers and Objections to Downers Grove Sanitary District's First Set of Interrogatories and Requests for Production of Documents to All Third-Party Plaintiffs in Pote v. Ames Supply Co. et al.:
- Ames Supply Company's Answers and Objections to Precision Brand Products, Inc.'s
   First Set of Interrogatories to All Other Defendants, Third-Party Defendants, and Fourth Party Defendants in Pote v. Ames Supply Co. et al.;
- White Lake Building Corporation's Answers and Objections to Scot, Incorporated's First Set of Interrogatories to Defendants and Third-Party Defendants in Pote v. Ames Supply Co. et al.;
- White Lake Building Corporation's Answers and Objections to Defendant Precision Brand Products, Inc. and Precision Steel Warehouse, Inc.'s First Interrogatories to All Other Defendants, Third-Party Defendants, and Fourth-Party Defendants in Pote v. Ames Supply Co. et al.;
- Ames Supply Company's Response to Third-Party Defendant Arrow Gear Company's
  First Set of Interrogatories and Document Production Requests to Third-Party
  Defendants in Bendik v. Precision Brand Products, Inc.; and Precision Steel Warehouse,
  Inc. et al.;
- White Lake Building Corporation's Response to Third-Party Defendant Arrow Gear Company's First Set of Interrogatories and Document Production Requests to Third-Party Defendants in Bendik v. Precision Brand Products, Inc.; and Precision Steel Warehouse, Inc. et al.;



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- Ames Supply Company's Answers and Objections to Lindy Manufacturing Company's
  First Set of Interrogatories to Defendants, Third-Party, and Fourth-Party Defendants in
  Pote v. Ames Supply Co. et al.;
- White Lake Building Corporation's Answers and Objections to Lindy Manufacturing Company's First Set of Interrogatories to Defendants, Third-Party, and Fourth-Party Defendants in Pote v. Ames Supply Co. et al.;
- Ames Supply Company's Answers and Objections to Lindy Manufacturing Company's
  First Set of Interrogatories to Third and Fourth-Party Defendants in Bendik v. Precision
  Brand Products, Inc.; and Precision Steel Warehouse, Inc. et al.;
- White Lake Building Corporation's Answers and Objections to Lindy Manufacuturing Company's First Set of Interrogatories to Third and Fourth-Party Defendants in Bendik v. Precision Brand Products, Inc.; and Precision Steel Warehouse, Inc. et al.

Per USEPA's instructions, copies of responsive documents that were submitted by Rexnord Industries, Inc. in its June 23, 2006 response to USEPA are not enclosed herewith.

Please contact me with any questions.

Sincerely,

**Enclosures** 

cc: Thomas J. Krueger, Esq. (via U.S. Mail w/o encl.)